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12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**
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16 FEDERAL TRADE COMMISSION,

17 Plaintiff,

18 v.

19 AMG SERVICES, INC., *ET AL.*,

20 Defendants, and

21 PARK 269 LLC, *ET AL.*,

22 Relief Defendants.
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Case No.: 2:12-CV-536-GMN-(VCF)

**DEFENDANTS' MOTION FOR LEAVE
TO FILE DOCUMENTS
UNDER SEAL**

1 Pursuant to Local Rule 10-5(b) and the Amended Confidentiality and Protective Order in
2 this case (ECF No. 308), AMG Services, Inc. and MNE Services, Inc. move this court for leave
3 to file under seal the following documents: *Supplemental Declaration in Support of Defendants’*
4 *Opposition to the FTC’s Motion for Summary Judgment* (“Supplemental Declaration”) and
5 accompanying exhibits. In support of this motion, Defendants state as follows:
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7 1. On January 11, 2013, this Court entered an amended protective order permitting
8 parties to designate documents and testimony as confidential, and to submit such information to
9 the Court under seal. (ECF No. 308, at 5 (“[F]or Confidential Information attached to or
10 included in dispositive motions, the moving party(ies) must articulate compelling reasons
11 supported by specific facts demonstrating that sealing the document outweighs the public’s
12 interest in disclosure . . .”).)

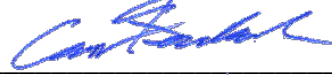
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14 2. Many of the exhibits accompanying the Supplemental Declaration contain
15 consumer data or business information designated “confidential” by the FTC or defendants.

16 3. The *Defendants’ Opposition to the FTC’s Motion for Summary Judgment*,
17 *Defendants’ Statement of Disputed Facts in Opposition to the FTC’s Motion for Summary*
18 *Judgment*, and *Defendants’ Rule 56(c)(2) Objection to FTC Evidence, or in the Alternative, Rule*
19 *56(d) Motion for Additional Discovery* contain repeated references to the exhibits designated
20 “confidential.”
21

22 4. In an abundance of caution, defendants seek leave of Court to file both the
23 Supplemental Declaration and accompanying exhibits under seal.

24 Accordingly, defendants respectfully ask the Court to grant their motion to file under
25 seal *Supplemental Declaration in Support of Defendants’ Opposition to the FTC’s Motion for*
26 *Summary Judgment* and accompanying exhibits.
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IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: 12-23-2013

Dated: December 10, 2013

/s/ David J. Merrill
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CERTIFICATE OF SERVICE

Pursuant to Federal Rule of Civil Procedure 5(b), I hereby certify that on the 10th day of December 2013, I submitted the foregoing *Defendants' Motion for Leave To File Documents Under Seal* electronically for filing and service with the United States District Court of Nevada. Service of the foregoing document shall be made to all counsel of record via electronic case filing.

/s/ Bradley H. Weidenhammer